

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>08-</u>
v.	:	DATE FILED: <u>October 14, 2008</u>
JOSE VENTURA	:	VIOLATIONS:
SALVADOR GONZALEZ	:	21 U.S.C. § 846 (conspiracy to possess
ENRIQUE CESAR WONG	:	with intent to distribute five kilograms or
LEONTE SUARES,	:	more of cocaine - 1 count)
a/k/a "Leon Suarez,"	:	21 U.S.C. § 846 (attempted possession
MARVIN NEAL	:	with intent to distribute five kilograms or
	:	more of cocaine - 1 count)
	:	21 U.S.C. § 841 (possession with intent to
	:	distribute five kilograms or more of
	:	cocaine - 1 count)
	:	18 U.S.C. § 2 (aiding & abetting)
	:	Notice of forfeiture
	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about June 2008 through on or about September 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JOSE VENTURA,
SALVADOR GONZALEZ,
ENRIQUE CESAR WONG,
LEONTE SUARES,
a/k/a "Leon Suarez," and
MARVIN NEAL**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute five kilograms or more of a mixture

and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendants JOSE VENTURA and SALVADOR GONZALEZ agreed to purchase cocaine from a person who, unknown to them, was a cooperating government source (“the CS”).

3. Defendant ENRIQUE CESAR WONG assisted defendant JOSE VENTURA in amassing the cash necessary to purchase the cocaine from the CS.

4. Defendant LEONTE SUARES brought additional cash to defendant JOSE VENTURA to give to the CS for the purchase of the cocaine.

5. After defendants JOSE VENTURA, SALVADOR GONZALEZ, ENRIQUE CESAR WONG, and LEONTE SAURES had pooled approximately \$53,500 United States currency and provided it to the CS, defendants WONG and MARVIN NEAL took possession of the cocaine.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object the defendants committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. In or about May 2008, defendant JOSE VENTURA met with the CS in El Paso, Texas, for the purpose of discussing the possibility of purchasing quantities of cocaine

from the CS. During this trip, the CS showed defendant VENTURA a kilogram of cocaine, and defendant VENTURA indicated that he was pleased with the quality of the cocaine.

2. In or about June 2008, the CS met with defendant JOSE VENTURA in Philadelphia, where defendant VENTURA introduced the CS to VENTURA's drug associates, including defendant SALVADOR GONZALEZ. Additionally, defendant VENTURA showed the CS various locations that he used in his drug-trafficking operation.

3. On or about September 11, 2008, defendants JOSE VENTURA and SALVADOR GONZALEZ met with the CS in Philadelphia to purchase cocaine from the CS. The CS showed defendants VENTURA and GONZALEZ approximately 54 kilogram packages, including six packages of actual cocaine and 48 packages of sham cocaine, and then discussed with them the details of a proposed sale of the cocaine.

On or about September 12, 2008:

4. The CS spoke with defendants JOSE VENTURA and SALVADOR GONZALEZ and agreed that the CS would sell 25 kilograms of cocaine to VENTURA and GONZALEZ for \$400,000, with the balance due at a later time.

5. Defendant JOSE VENTURA and defendant ENRIQUE CESAR WONG met with the CS for the purpose of giving the CS money for the cocaine. Defendant WONG gave approximately \$20,000 in cash to defendant VENTURA, who gave the money to the CS.

6. Defendant JOSE VENTURA spoke with defendant SALVADOR GONZALEZ, and defendant GONZALEZ agreed to bring an additional \$20,000 in cash to defendant VENTURA, who was waiting with the CS and defendant ENRIQUE CESAR WONG in a South Philadelphia parking lot.

7. Defendant LEONTE SUARES, arrived in the parking lot and entered the CS's car, where he handed a stack of United States currency to defendant JOSE VENTURA and another stack of currency to defendant ENRIQUE CESAR WONG, while keeping a stack of United States currency himself. Defendants VENTURA, WONG, and SUARES then counted the money, announcing that they had \$13,500.

8. Defendant SALVADOR GONZALEZ then arrived and handed defendant ENRIQUE CESAR WONG a black bag containing a large amount of United States currency. Defendant WONG re-entered the CS's car and showed the money to defendant JOSE VENTURA and the CS. Defendant WONG then put the money in the armrest. Defendant VENTURA entered defendant GONZALEZ's car and defendants VENTURA and GONZALEZ then left.

9. The CS drove defendant ENRIQUE CESAR WONG to the "load car" where the cocaine was stored, and WONG opened the trunk where approximately 25 kilogram packages were stored in a duffle bag, including six kilograms of cocaine and 19 kilograms of sham cocaine.

10. Defendant MARVIN NEAL arrived in the parking lot and spoke with defendant ENRIQUE CESAR WONG. Defendant NEAL then took the duffle bag, containing 25 kilo packages, including six kilograms of cocaine and 19 kilograms of sham cocaine from the trunk of the load car.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JOSE VENTURA,
SALVADOR GONZALEZ,
ENRIQUE CESAR WONG,
LEONTE SUARES,
a/k/a “Leon Suarez,” and
MARVIN NEAL**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(A), and Title 18, United States Code, Section 2.

In violation of Title 21, United States Code, Section 846.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ENRIQUE CESAR WONG and
MARVIN NEAL**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, five kilograms or more, that is, approximately six kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendants

**JOSE VENTURA,
SALVADOR GONZALEZ
ENRIQUE CESAR WONG,
LEONTE SUARES,
a/k/a “Leon Suarez,” and
MARVIN NEAL**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including but not limited to \$53,500 in United States currency seized from defendants JOSE VENTURA, SALVADOR GONZALEZ, ENRIQUE CESAR WONG, LEONTE SUAREZ, and MARVIN NEAL.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided
without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to
seek forfeiture of any other property of the defendant up to the value of the property subject to
forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

LAURIE MAGID
Acting United States Attorney